

Comments received via email on 05/19/2011

Comments of the Audubon Society of New Hampshire (ASNH) on the Draft Land-Based Wind Energy Guidelines (Guidelines). ASNH is a non-governmental conservation organization dedicated to the protection of New Hampshire's environment for wildlife and for people. Our organization has a long history of collaboration with the U.S. Fish and Wildlife Service and the New Hampshire Fish and Game Department in monitoring and management of New Hampshire's migratory bird populations.

We believe strongly that **some** regulations should be promulgated to protect wildlife in the face of proliferating wind energy development in the United States. At minimum, we believe such regulations should require:

- 1) Baseline surveys to determine presence/absence of species of conservation concern at the federal, regional, or state levels
- 2) Before-after-control-impact studies at sites with species of conservation concern to determine impacts on those species and appropriate mitigation strategies
- 3) Post-construction fatality studies, including searcher efficiency and scavenger removal trials.
- 4) Development and implementation of approved avian and bat protection plans
- 5) Adherence to Best Management Practices

The Draft Land-Based Wind Energy Guidelines provide detailed recommendations for assessing potential impacts of wind energy facilities on fish, wildlife, and their habitats, and we generally support the recommendations therein. We do have suggestions that we believe could strengthen the document.

We suggest reorganizing Section B.1. Factors to Consider When Assessing Effects to improve clarity.

- 1) Combine the discussions of Habitat Loss and Degradation with Displacement and make this section b. Discuss edge effects of increased nest parasitism and predation in this section. Move the second paragraph of Barrier Effects to this section.
- 2) Combine the discussions of Barrier Effects and Habitat Fragmentation, since barrier effects result in effective fragmentation.

Indirect effects: Mention increased windthrow along the edges of residual forest as an effect that can manifest later in time than the causing action.

Eagles

Include some mention of the status of Golden Eagles in the East.

Glossary

Affected Species – Include any species identified as a species of conservation concern in a State Wildlife Action Plan.

Include a definition of Barotrauma.

Editorial suggestions

Page 10 Habitat Loss and Degradation

Revise first sentence to read “Wind project development results in direct habitat loss and habitat modification, especially at previously undeveloped *sites in extensive unfragmented landscapes.*”

Revise last sentence to read “...less obvious is the potential reduction of habitat quality *within various distances from the project footprint.*”

Page 10 Habitat Fragmentation

Revise first sentence to read “Habitat fragmentation separates *what were formerly extensive* blocks of *contiguous* habitat into *isolated* segments, such that individuals in the remaining habitat segments may suffer...”

Revise second sentence to read “...and arrays of turbine towers may fragment habitat for some species into smaller, isolated tracts.”